

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:14-CR-00175 AGF (DDN)
)	
MARK PALMER <i>et. al</i> ,)	
)	
Defendant.)	

**DEFENDANTS' JOINT CONSENTED MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS**

COME NOW Defendants, by and through their respective undersigned counsel, and hereby jointly move this Court to enter its Order extending to March 1, 2016 the deadline to file motions to suppress tangible evidence, statements or evidence obtained through electronic surveillance. In support of their motion, to which the Government has no objection, Defendants state as follows:

1. On October 7, 2015 the Court entered an Order requiring Defendants to file pretrial motions to suppress tangible evidence, motions to suppress statements and motions to suppress evidence obtained through electronic surveillance ("Pretrial Motions") no later than December 15, 2015. *See* Doc. 180.

2. Through subsequent Motions and the Court's Orders on the same, the current deadline to file Pretrial Motions is February 16, 2016. *See* Doc. 204.

3. Defendants now move this Honorable Court for additional time to file Pretrial Motions, specifically up to and including March 1, 2016.

4. Counsel for the undersigned Defendants have met regularly to work on any potential motions to suppress that may lie in this case. The efforts of counsel, however,

were recently hindered due to immediate personal obligations and other professional obligations that have hampered the ability of counsel to coordinate their efforts. Additional time is necessary for counsel to confer and determine which motions are appropriate for their respective clients to make and how motions may be made jointly where possible.

5. The additional time Defendants are requesting through this motion is necessary to afford counsel the reasonable time necessary to effectively complete their respective investigation and to prepare any necessary motions to suppress.

6. Counsel for Defendant Robert Wolfe in Case number 4:14-CR-00175-AGF(DDN) communicated with Assistant U.S. Attorney James Delworth on behalf of all defendants regarding the extension of time sought by this Motion, and the Government does not object to the relief requested by Defendants being granted by the Court.

WHEREFORE, for the foregoing reasons, Defendants jointly request that the Court grant their motion for an extension of time to file motions to suppress and enter its Order extending the deadline for the filing of such suppression motions or waivers of the same to and including March 1, 2016.

Dated: February 10, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 10th day of February, 2016, a true and correct copy of the foregoing was filed with the Court using the CM/ECF system, and service upon all participants in the case who are CM/ECF users will be accomplished by operation of that system.

/s/Zachary J. Borowiak